

SHER TREMONTE LLP

February 12, 2025

VIA ECF

The Honorable LaShann DeArcy Hall
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. Marcus Ricketts, et al.*,
Case No. 22-CR-106 (LDH)

Dear Judge DeArcy Hall:

I represent Jonathan Goulbourne. I write to respectfully request that the Court reappoint Krista Staropoli, an associate at my firm, to represent Mr. Goulbourne on the matter. On November 8, 2023, Your Honor appointed Martin Njoroge as an associate on this case pursuant to the Criminal Justice Act (ECF No. 210). As of January 1, 2025, Mr. Njoroge is no longer with my firm. However, Ms. Staropoli, who was originally appointed as an associate on October 24, 2022 (ECF No. 144), but withdrew when she began a clerkship on the Third Circuit, has returned to the firm following her clerkship. Accordingly, I respectfully request that Mr. Njoroge be terminated as counsel and Ms. Staropoli be reappointed.

I appreciate Your Honor's consideration.

Respectfully submitted,

/s/ Noam Biale
Noam Biale

Attorney for Jonathan Goulbourne

cc: All counsel (via ECF)